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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION**

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HECTOR BORREGO,  
  
Plaintiff,

vs.

EDWIN FEREVSKI, BENJAMIN SELU, and  
SALT LAKE CITY CORPORATION,  
  
Defendants.

**NOTICE OF REMOVAL**

Case No. 2:24-cv-404-CMR

Magistrate Judge Cecilia M. Romero

State Court Case No. 240903570

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Pursuant to 28 U.S.C. §§ 1441 and 1446, Defendant Salt Lake City Corporation (the “City”) hereby give Notice of Removal of the civil action filed by Hector Borrego (“Plaintiff”) in the Third Judicial District Court, Case No. 240903570, Salt Lake County, State of Utah.

The grounds for removal are as follows:

1. On May 7, 2024, Plaintiff commenced a civil action by filing a complaint in the Third Judicial District Court, Salt Lake County, State of Utah as Case No. 240903570. On May 13, 2024, Plaintiff’s counsel served a copy of the Summons and the Complaint on Defendant Salt Lake City at the Salt Lake City Recorder’s Office. *See* Summons and Complaint, attached as Exhibit A.

2. Plaintiffs' Complaint contains causes of action against the City for alleged violation of civil rights under 42 U.S.C. § 1983, and specifically, use of excessive force in violation of the Fourth Amendment of the United States Constitution. *See* Exhibit A, Compl. at 8-12. As such, the United States District Court for the District of Utah, Central Division, has original jurisdiction over Plaintiff's civil action pursuant to 28 U.S.C. § 1331.

3. Additionally, removal of this action is timely. Fewer than thirty (30) days have elapsed since Defendant Salt Lake City was served. *See* 28 U.S.C. § 1446(b).

4. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders served upon Defendant Salt Lake City in this action are attached as Exhibit A.

DATED: June 5, 2024.

SALT LAKE CITY CORPORATION

/s/ Samantha J. Slark  
Samantha J. Slark  
*Attorney for Defendant Salt Lake City*

**CERTIFICATE OF SERVICE**

I hereby certify that on 5th day of June, 2024, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court, which sent notice to:

James P. Roberts  
PALMER PERLSTEIN  
15455 Dallas Parkway, Suite 540  
Addison, TX 75001  
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*Attorney for Plaintiff*

/s/ Heidi Christley